

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
: Plaintiff, :
: v. : MOTION TO ADMIT JAMES A.
BRYANSTON GROUP INC. et al., : BRUTON, III PRO HAC VICE
: Defendants. :
: X

JUL 2 2008

Pursuant to Local Civil Rule 1.3(c), undersigned counsel respectfully moves for the admission *pro hac vice* of the following attorney in the above-captioned matter:

James A. Bruton, III
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Tel: (202) 434-5000
Fax: (202) 434-5029

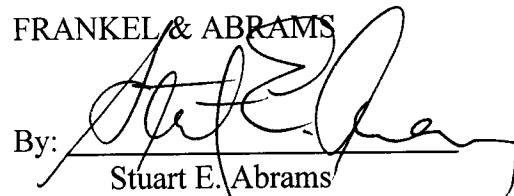
Mr. Bruton is a member in good standing of the Bar of the District of Columbia and the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Mr. Bruton in any State or Federal Court. This Motion is based on the accompanying Affidavit of Stuart E. Abrams and Certificates of Good Standing from the District of Columbia Bar and the Pennsylvania Bar. A proposed Order is attached hereto.

JUL 25 2008
JUL 2 2008

Dated: July 25, 2008

FRANKEL & ABRAMS

By:



Stuart E. Abrams
Frankel & Abrams
230 Park Avenue, Suite 660
New York, New York 10169-0005
(212)661-5000

Counsel for Claimant Beatrice Tollman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
Plaintiff, :
v. : DECLARATION OF STUART E.
BRYANSTON GROUP INC. et al., : ABRAMS IN SUPPORT OF
Defendants. : MOTION TO ADMIT JAMES A.
X : BRUTON, III PRO HAC VICE

I, STUART E. ABRAMS, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby declare the following to be true under the penalties of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner at Frankel & Abrams and counsel for Claimant Beatrice Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth here and in support of the motion to admit James A. Bruton, III as counsel pro hac vice to represent Ms. Tollman in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1978. I am also a member in good standing of the bar of this Court, admitted in 1978.

3. I have known Mr. Bruton since 1987.

4. Mr. Bruton is a partner at Williams & Connolly, in Washington,

DC.

5. I have found Mr. Bruton to be a skilled attorney and person of the highest integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

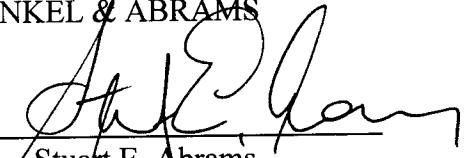
6. Mr. Bruton is a member in good standing of the bar of the District of Columbia and the bar of the Commonwealth of Pennsylvania. In connection with this motion, I am submitting Certificates of Good Standing issued by these bars. I am aware of no pending disciplinary proceedings against Mr. Bruton in any state or federal court.

7. For the foregoing reasons, I respectfully move the *pro hac vice* admission of James A. Bruton, III in the above-captioned matter. For the Court's convenience, a proposed order granting this motion is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By:


Stuart E. Abrams
Frankel & Abrams
230 Park Avenue, Suite 660
New York, New York 10169-0005
(212)661-5000
Counsel for Claimant Beatrice Tollman



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES A. BRUTON, III

was on the 16TH day of MARCH, 1982

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: G. Charles
Deputy Clerk



Supreme Court of Pennsylvania

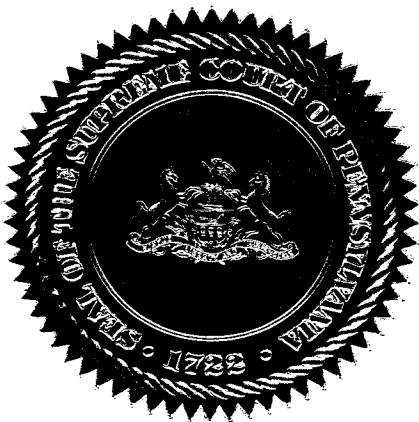
CERTIFICATE OF GOOD STANDING

James A. Bruton, III, Esq.

DATE OF ADMISSION

October 31, 1975

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 16, 2008

A handwritten signature in black ink, appearing to read "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
:
Plaintiff, : [PROPOSED] ORDER FOR
: ADMISSION OF JAMES A.
v. : BRUTON, III PRO HAC VICE
:
BRYANSTON GROUP INC. et al., :
: Defendants. :
:
X

This matter having been brought before the Court by motion pursuant to Local Civil Rule 1.3(c) for the admission *pro hac vice* of James A. Bruton, III, Esq., in the above-captioned matter, it is this ___ day of _____ 2008, hereby

ORDERED that the motion is GRANTED, and

IT IS FURTHER ORDERED THAT James A. Bruton, III shall be admitted *pro hac vice* in the above-captioned matter. Counsel shall remit the required \$25 fee to the Cashier's Office for this *pro hac vice* admission.

Dated:

HON. LORETTA A. PRESKA, U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA,
Plaintiff,
v.
BRYANSTON GROUP INC., et al.,
Defendants.
-----x

CERTIFICATE OF SERVICE

STUART E. ABRAMS, hereby certifies that on July 28, 2008, I caused to be served by First Class Mail a true and correct copy of the attached Motion for Admission Pro Hac Vice and supporting papers upon

Barbara Ann Ward
U.S. Attorney's Office, SDNY
One St. Andrew's Plaza
New York, NY 10007

Stanley John Okula, Jr.
U.S. Attorney's Office, SDNY
300 quarropas Street, 3rd Floor
White Plains, NY 10601

John Russell Wing
Lankler Siffert & Wohl LLP
500 Fifth Avenue
33rd Floor
New York, NY 10110

K. Chris Todd, Esq.
Kellogg, Huber, Hansen, Todd,
Evans & Figel, P.L.L.C.
1615 M St. NW, Suite 400
Washington, D.C. 20036

Dated: July 28, 2008

By: 
Stuart E. Abrams
Counsel for Stanley Tollman